

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

In re:

CATHY LORRAINE WILLIAMS

Case No. 19-10655

Chapter 13

Debtor

OBJECTION TO PROOF OF CLAIM #2
FILED BY U.S. BANK TRUST, N.A.

Debtors, Cathy L. Williams, by her undersigned counsel, objects to the Proof of Claim #2 filed herein by U.S. Bank Trust, N.A., as Trustee of Cabana Series III Trust c/o BSI Financial Services, hereinafter called the (“Creditor”) and states the following as reasons:

1. That Debtor filed the instant Chapter 13 case on January 16, 2019.
2. That on or about March 27, 2019, Creditor filed a Proof of Claim (Claim #2) reflecting Debtor’s debt owed to the Creditor for Mortgage Arrearages in the amount of \$63,779.00.
3. That the Debtors assert that the Proof of Claim is inaccurate as the Debtors believe the Mortgage Arrearages are incorrectly calculated. The Debtors are attempting to negotiate with the creditor to determine the correct amount due.

WHEREFORE, Debtors request that this Honorable Court disallow the Creditor’s Proof of Claim or require a hearing on the matter.

/s/ Marlow A. Henderson, III
MARLOW A. HENDERSON, III 27706
1829 Reisterstown Road, Suite 350
Pikesville, MD 21208
Phone/ Fax: (888) 625-6243
Email: mah3@mah3.com

NOTICE TO CREDITOR AND REQUEST FOR HEARING

PURSUANT TO LOCAL RULE 3007-1, YOU ARE (1) ADVISED THAT WITHIN THIRTY (30) DAYS AFTER THE DATE ON THE CERTIFICATE OF SERVICE, YOU MAY FILE AND SERVE A MEMORANDUM IN OPPOSITION TOGETHER WITH ANY DOCUMENTS AND OTHER EVIDENCE THE CLAIMANT WISHED TO ATTACH IN SUPPORT OF IT'S CLAIM, UNLESS YOU WISH TO RELY SOLELY UPON THE PROOF OF CLAIM; AND AN INTERESTED PARTY MAY REQUEST A HEARING THAT WILL BE HELD IN THE COURT'S DISCRETION.

/s/ Marlow A. Henderson, III
MARLOW A. HENDERSON, III

POINTS AND AUTHORITIES

1. 11 U.S.C. §502; 11 U.S.C. §727
2. The record herein.

/s/ Marlow A. Henderson, III
MARLOW A. HENDERSON, III

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of May 2019, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing was sent electronically to the following:

U.S. Bank Trust N.A.,
as Trustee of the Cabana Series III Trust
c/o BSI Financial Services

bankruptcymd@mwc-law.com

SECU of MD, Inc.
c/o Candy L. Thompson, LLC
Candy L. Thompson, Esq.

cthompson@candythompsonlaw.com

PNC Bank, N.A.
c/o Samuel I. White, PC

Randa S. Azzam, Esq.

RAzzam@siwpc.com

Synchrony Bank
c/o PRA Receivables Management, LLC

claims@recoverycorp.com

Robert S. Thomas, II, Trustee

ECF@ch13balt.com

Office of the U.S. Trustee

I hereby certify that on the 2nd day of May 2019, no other parties were served by mail as the Objection to Proof of Claim #2 notified those parties served electronically and the Debtor in this instant case.

/s/ Marlow A. Henderson, III
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